

In compliance with Local Rule 7.2(e), the proposed Protective Order expressly provides that any document proposed to be filed under seal may only be so filed after allowance in advance of a motion to file under seal and does not include a blanket order authorizing filing of confidential information under seal.

WHEREFORE, Dunlap, Grubb & Weaver, PLLC, US Copyright Group, Thomas Dunlap, and Nicholas Kurtz, with the assent of the plaintiff, respectfully request that this Court enter the proposed Protective Order attached hereto as Exhibit A.

Respectfully submitted,

The Defendants,
Dunlap, Grubb & Weaver, PLLC,
US Copyright Group,
Thomas Dunlap, and Nicholas Kurtz

By their counsel,

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Certificate of Service

I, Kara Thorvaldsen, hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF). I am not aware of any party who is a non registered participant, and therefore electronic filing is the sole means of service of this document.

/s/ Kara Thorvaldsen